

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Larry D. Bossler) Chapter 13
Valerie A. Bossler) Case No. 1:20-bk-03381**

**Debtors)
PHH Mortgage Corporation)
Movant)
Larry D. Bossler)
Valerie A. Bossler)
Respondents)
Jack N. Zaharopoulos, Trustee)**

**DEBTORS' RESPONSE TO MOTION OF PHH MORTGAGE CORPORATION'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362
PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, PHH Mortgage Corporation, filed its Motion for Relief from Stay on August 27, 2021.
2. Debtors acknowledge that some mortgage payments are past due.
3. Debtors desire the opportunity to cure any post-petition mortgage arrears and keep their home.
4. Debtors request the Court deny Movant's Motion for Relief.

WHERFORE, Debtors, Larry D. Bossler and Valerie A. Bossler, prays the Court enter its Order denying the Motion for Relief from the Automatic Stay that was filed August 27, 2021 by PHH Mortgage Corporation.

Dated: August 31, 2021

Respectfully Submitted,

/s/Nicholas G. Platt
Nicholas G. Platt (327239)
Counsel for Debtors
Mooney Law
230 York Street
Hanover, PA 17331
ngr@mooney4law.com
(717) 243-4770 Phone
(717) 632-3612 Fax